

Dear FCC Commissioners:

As someone who has worked in the field of radio broadcasting for over thirty years, I find many of the proposals in MB Docket No. 04-233 to be very troubling.

One proposal would require broadcasters to set up a community advisory panel. Historically, it has always been the FCC's position that the license holder is solely responsible for programming content. There is no compelling reason to change this position. Licensees are required to file a quarterly report, describing when, and how, issues in the community of license were addressed.

Another proposal would require that a station be staffed around the clock. This proposal would put an unbearable financial hardship on broadcasters in small to medium markets. At worst, they would be put out of business. At best, many smaller operations would have to sign their stations off during the nighttime hours in order to save on expenses. In either case, the end result would be the exact opposite of what the Commission is trying to achieve.

A third proposal would require stations to locate their operations in their City of License. Several years ago the Commission relaxed its rules on where a station could locate its main studio. As a result, most broadcasters who own more than one station in a market have consolidated their studio and business operations to one location. To require a broadcast company to abandon this business model, and revert back having studios in each, and every, City of License would be financially devastating for most broadcasters.

In conclusion, broadcasters do indeed have a responsibility to serve their local communities. Some broadcaster do an excellent job, others could show some improvement. The proposals in MB Docket No. 04-233 would do little or nothing to improve broadcast localism. Instead, it would just place an unreasonable financial burden on broadcasters, especially those in the smaller markets.

Please reconsider implementing these proposals.

Sincerely,

Dennis Blais